

FEB 07 2013

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINTAT GREENBELT
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND

BY



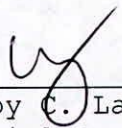
I, Bobby C. Lawson, having been duly sworn, hereby depose and state as follows:

1. I am a Special Agent with the United States Department of State, Diplomatic Security Service (DSS) and have been so employed since September 2012. My duties include, but are not limited to investigating U.S. Passport and Visa fraud, as well as other related crimes involving fraudulent documents. I am a graduate of the Criminal Investigator Training Program at the Federal Law Enforcement Training Center in Brunswick, Georgia and the Basic Special Agent Course at the Diplomatic Security Training Center in Dunn Loring, Virginia. Prior to becoming a Special Agent, I was an Immigration Enforcement Agent with Immigration and Customs Enforcement (ICE) since November 2009. The information contained in this affidavit is based upon your Affiant's personal knowledge in addition to information provided to your Affiant by other law enforcement officials. This affidavit does not contain every material fact that I have learned during the course of this investigation; however, no information known to me that would tend to negate probable cause has been withheld from this affidavit.
2. This statement of facts is made in support of a criminal complaint against Cauldon Samuel Augus Chambers (DOB: 10/25/19XX), for violations of Title 18, United States Code, Sections 1542 (False Statement in a Passport Application); 1028A (Aggravated identity theft); and Title 42 United States Code 408 (willfully, knowingly, and with intent to deceive, uses another's social security account number).
3. There is probable cause to suspect that on April 12, 2012, Cauldon Samuel Augus Chambers ("Chambers"), while purporting to be Kevin Lashon Payne, applied for a U.S. Passport in the

District of Maryland. Chambers, while claiming to be Payne, signed and submitted U.S. Passport Application (DS-11) #248859691 to the United States Post Office, Temple Hills, MD. Chambers listed Payne's Social Security Number XXX-XX-8397 and provided a genuine Washington D.C Identification Card (ID) #2956788 bearing Payne's name but Chambers' photograph as proof of identity. Chambers submitted Payne's actual Ohio Birth Certificate #1985129492, as proof of U.S. Citizenship.

4. Chambers swore to the veracity of, and signed the application, in order to cause the United States Department of State to issue a U.S. Passport in the name of Kevin Lashon Payne.
5. My investigation (#PF-2012-51645) has confirmed that the true Kevin Lashon Payne (DOB: 10/29/19XX; SSN: XXX-XX-8397) is a United States citizen who is current imprisoned in Ohio. I have obtained documentation authenticating Kevin Lashon Payne's identity and citizenship including photocopies and records of Payne's 1) Ohio (OH) State ID #ST731946, 2) Social Security Administration (SSA) Card #XXX-XX-4485, 3) State of Ohio Birth Certificate #1985129492, and 4) Ohio Department of Rehabilitation and Corrections Inmate Photo.
6. I have determined during my investigation (#PF-2012-51645) that the true Cauldon Samuel Augus Chambers (DOB: 10/25/19XX; SSN: XXX-XX-8981) is an Aggravated Felon with convictions for Burglary, Firearms, and Drug Charges. Chambers was removed from the United States, by Department of Homeland Security (DHS) Enforcement and Removal Operations on 7/28/2007. Documentation I have obtained that authenticates Cauldon Samuel Augus Chambers' identity and immigration status includes photocopies and records of his 1) Maryland (MD) State ID Card #10440DE5E3, 2) DHS Alien file #044847179, and 3) DHS I-205 Order of Removal.

7. Based upon the above information, your Affiant has probable cause to believe that Cauldon Samuel Augus Chambers, has violated Title 18, United States Code, Sections 1542 (False Statement in a Passport Application); 1028A (Aggravated identity theft); and Title 42 United States Code 408 (willfully, knowingly, and with intent to deceive, uses a social security account number) in that he made false statements in an application for a United States Passport by representing himself to be Kevin Lashon Payne with Social Security Number XXX-XX-8397, and that he was born in Ohio on October 29, 19XX, knowing said statements to be false, and that he willfully and knowingly used a means of identification of another person to aid the unlawful activity with the intent to secure the issuance of passports and the rules prescribed pursuant to such laws under the authority of the United States.



Bobby C. Lawson
Special Agent
U.S. Department of State
Diplomatic Security Service

Subscribed and sworn to before me on the 5th day of February 2013.



William Connelly
Chief U.S. Magistrate Judge